

CH

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

FILED

AUG 20 2009 TC
 AUG 20 2009
 MICHAEL W. ROPPING
 CLERK, U.S. DISTRICT COURT
 No. 07 C 1367

Phoenix bond & indemnity co.,)	
BCS SERVICES, INC.,)	
Plaintiffs,)	Chief Judge Holderman
V.)	Magistrate Judge Maria Valdez
Heartwood 88, Inc. et al,)	
Defendants,)	

Answer to second Amended Complaint

NOW COMES defendant, Gregory Stec by and through his own person and as for his answer to the Complaint states as follows:

Nature of Action

- 1) This is an action to recover alleged damages to plaintiffs suffered as a result of alleged series of fraudulent schemes and collusive bidding in the Cook County Tax Sale.

Defendant DENIES the allegations contained in paragraph 1 of the complaint

- 2) **Jurisdiction and Venue**

Defendant ADMITS that this court has proper jurisdiction.

- 3) **Defendant ADMITS that this court is the proper venue.**

Parties

- 4) **Defendant Cannot admit or deny**
- 5) **Defendant Cannot admit or deny**
- 6) **Defendant Cannot admit or deny**
- 7) **Defendant Cannot admit or deny**
- 8) **Defendant Cannot admit or deny**
- 9) **Defendant Cannot admit or deny**
- 10) **Defendant Cannot admit or deny**
- 11) **Defendant Cannot admit or deny**
- 12) **Defendant Cannot admit or deny**

- 13) Defendant Cannot admit or deny
- 14) Defendant Cannot admit or deny
- 15) Defendant Cannot admit or deny
- 16) Defendant Cannot admit or deny
- 17) Defendant Cannot admit or deny
- 18) Defendant Cannot admit or deny
- 19) Defendant Cannot admit or deny
- 20) Defendant Cannot admit or deny
- 21) Defendant Cannot admit or deny
- 22) Defendant Cannot admit or deny
- 23) Defendant Cannot admit or deny
- 24) Defendant Cannot admit or deny
- 25) Defendant Cannot admit or deny
- 26) Defendant Cannot admit or deny
- 27) Defendant Cannot admit or deny
- 28) Defendant Cannot admit or deny
- 29) Defendant Cannot admit or deny
- 30) Defendant Cannot admit or deny
- 31) Defendant Cannot admit or deny

Third Party Co-Conspirators

- 32) Defendant Cannot admit or deny
- 33) Defendant Cannot admit or deny
- 34) Defendant Cannot admit or deny
- 35) Defendant Cannot admit or deny
- 36) Defendant Cannot admit or deny

Factual Background to all Counts

- 37) Defendant Cannot admit or deny
- 38) Defendant Cannot admit or deny
- 39) Defendant Admits to the contents of paragraph 39
- 40) Defendant Admits to the contents of paragraph 40
- 41) Defendant Admits to the contents of paragraph 41
- 42) Defendant Admits to the contents of paragraph 42
- 43) Defendant denies the allegations in paragraph 43
- 44) Defendant Admits to the contents of paragraph 44
- 45) Defendant admits to the contents of Paragraph 45
- 46) Defendant lacks sufficient information to form an opinion onto the truth or lack of
Truth of the allegations contained in paragraph 46. Therefore, neither admits nor denies
Same but demands strict proof thereof.
- 47) Defendant lacks sufficient information to form an opinion onto the truth or lack of
Truth of the allegations contained in paragraph 46. Therefore, neither admits nor denies
Same but demands strict proof thereof.
- 48) Defendant agrees with contents contained in Paragraph 48
- 49) Defendant cannot deny or admit contents in paragraph 49

- 50) Defendant cannot deny or admit contents in paragraph 50
- 51) Defendant agrees with contents contained in Paragraph 51
- 52) Defendant cannot deny or admit contents in paragraph 52
- 53) Defendant cannot deny or admit contents in paragraph 53
- 54) Defendant cannot deny or admit contents in paragraph 54

The Cook County Single Simultaneous Bidder Rule

- 55) Defendant admits to contents in paragraph 55.
- 56) Defendant admits to contents in paragraph 56
- 57) Defendant admits to contents in paragraph 57
- 58) Defendant admits to contents in paragraph 58
- 59) Defendant admits to contents in paragraph 59

Sabre's Scheme to Obtain Additional Liens Beyond its Appropriate Portion

- 60) Defendant cannot deny or admit contents in paragraph 60.
- 61) Defendant cannot deny or admit contents in paragraph 61
- 62) Defendant cannot deny or admit contents in paragraph 62
- 63) Defendant cannot deny or admit contents in paragraph 63
- 64) Defendant cannot deny or admit contents in paragraph 64
- 65) Defendant cannot deny or admit contents in paragraph 65

2002 Tax Sale

- 66) Defendant cannot deny or admit contents in paragraph 66
- 67) Defendant cannot deny or admit contents in paragraph 67
- 68) Defendant cannot deny or admit contents in paragraph 68
- 69) Defendant cannot deny or admit contents in paragraph 69
- 70) Defendant cannot deny or admit contents in paragraph 70
- 71) Defendant cannot deny or admit contents in paragraph 71
- 72) Defendant cannot deny or admit contents in paragraph 72

2003 Sale

- 73) Defendant cannot deny or admit contents in paragraph 73
- 74) Defendant cannot deny or admit contents in paragraph 74
- 75) Defendant cannot deny or admit contents in paragraph 75
- 76) Defendant cannot deny or admit contents in paragraph 76
- 77) Defendant cannot deny or admit contents in paragraph 77
- 78) Defendant cannot deny or admit contents in paragraph 78
- 79) Defendant cannot deny or admit contents in paragraph 79
- 80) Defendant cannot deny or admit contents in paragraph 80
- 81) Defendant cannot deny or admit contents in paragraph 81
- 82) Defendant cannot deny or admit contents in paragraph 82
- 83) Defendant cannot deny or admit contents in paragraph 83
- 84) Defendant cannot deny or admit contents in paragraph 84
- 85) Defendant cannot deny or admit contents in paragraph 85
- 86) Defendant cannot deny or admit contents in paragraph 86

2004 Tax Sale

- 87) Defendant cannot deny or admit contents in paragraph 87

- 88) Defendant cannot deny or admit contents in paragraph 88
- 89) Defendant cannot deny or admit contents in paragraph 89
- 90) Defendant cannot deny or admit contents in paragraph 90
- 91) Defendant cannot deny or admit contents in paragraph 91
- 92) Defendant cannot deny or admit contents in paragraph 92
- 93) Defendant cannot deny or admit contents in paragraph 93
- 94) Defendant cannot deny or admit contents in paragraph 94
- 95) Defendant cannot deny or admit contents in paragraph 95
- 96) Defendant cannot deny or admit contents in paragraph 96
- 97) Defendant cannot deny or admit contents in paragraph 97
- 98) Defendant cannot deny or admit contents in paragraph 98
- 99) Defendant cannot deny or admit contents in paragraph 99
- 100) Defendant cannot deny or admit contents in paragraph 100
- 101) Defendant cannot deny or admit contents in paragraph 101
- 102) N/A
- 103) N/A
- 104) N/A
- 105) N/A
- 106) Defendant cannot deny or admit contents in paragraph 106
- 107) Defendant cannot deny or admit contents in paragraph 107
- 108) N/A
- 109) Defendant cannot deny or admit contents in paragraph 108
- 110) N/A
- 111) Defendant cannot deny or admit contents in paragraph 111
- 112) Defendant cannot deny or admit contents in paragraph 112
- 113) Defendant cannot deny or admit contents in paragraph 113
- 114) Defendant cannot deny or admit contents in paragraph 114
- 115) Defendant cannot deny or admit contents in paragraph 115

2005 Annual Tax Sale

- 116) Defendant cannot deny or admit contents in paragraph 116
- 117) Defendant cannot deny or admit contents in paragraph 117
- 118) Defendant cannot deny or admit contents in paragraph 118
- 119) Defendant cannot deny or admit contents in paragraph 119
- 120) Defendant cannot deny or admit contents in paragraph 120
- 121) Defendant cannot deny or admit contents in paragraph 121
- 122) Defendant cannot deny or admit contents in paragraph 122
- 123) Defendant cannot deny or admit contents in paragraph 123
- 124) Defendant cannot deny or admit contents in paragraph 124
- 125) Defendant cannot deny or admit contents in paragraph 125
- 126) Defendant cannot deny or admit contents in paragraph 126
- 127) Defendant cannot deny or admit contents in paragraph 127
- 128) Defendant cannot deny or admit contents in paragraph 128
- 129) Defendant cannot deny or admit contents in paragraph 129
- 130) Defendant cannot deny or admit contents in paragraph 130

131) Defendant cannot deny or admit contents in paragraph 131

RICO Predicate Acts

- 132) Defendant cannot deny or admit contents in paragraph 132
- 133) Defendant cannot deny or admit contents in paragraph 133
- 134) Defendant cannot deny or admit contents in paragraph 134
- 135) Defendant cannot deny or admit contents in paragraph 135
- 136) Defendant cannot deny or admit contents in paragraph 136
- 137) Defendant cannot deny or admit contents in paragraph 137
- 138) Defendant cannot deny or admit contents in paragraph 138
- 139) Defendant cannot deny or admit contents in paragraph 139

Count I

- 140) Defendant agrees with contents contained in paragraph 140
- 141) Defendant denies allegations in paragraph 141
- 142) Defendant denies allegations in paragraph 142
- 143) Defendant denies allegations in paragraph 143
- 144) Defendant denies allegations in paragraph 144
- 145) Defendant denies allegations in paragraph 145
- 146) Defendant denies allegations in paragraph 146
- 147) Defendant denies allegations in paragraph 147
- 148) Defendant denies allegations in paragraph 148

Count II

- 149) Defendant agrees with contents contained in paragraph 149
- 150) Defendant denies allegations in paragraph 150
- 151) Defendant denies allegations in paragraph 151
- 152) Defendant denies allegations in paragraph 152

Count III

- 153) Defendant admits contents in paragraph 153
- 154) Defendant cannot deny or admit contents in paragraph 154
- 155) Defendant cannot deny or admit contents in paragraph 155
- 156) Defendant cannot deny or admit contents in paragraph 156
- 157) Defendant cannot deny or admit contents in paragraph 157
- 158) Defendant cannot deny or admit contents in paragraph 159

Count IV

- 159) Defendant agrees to contents in paragraph 159
- 160) Defendant denies allegations in paragraph 160
- 161) Defendant denies allegations in paragraph 161
- 162) Defendant denies allegations in paragraph 162

163) Defendant denies allegations in paragraph 163

164) Defendant denies allegations in paragraph 164

Count V

165) Defendant agrees with the contents of paragraph 165

166) Defendant cannot deny or admit contents in paragraph 166

167) Defendant cannot deny or admit contents in paragraph 167

168) Defendant cannot deny or admit contents in paragraph 168

169) Defendant cannot deny or admit contents in paragraph 169

170) Defendant cannot deny or admit contents in paragraph 170

171) Defendant denies the allegations in paragraph 171

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Pt. Envoy Bond & Insurance Co.

PLAINTIFF

CASE NO. 07 C 1367

VS.

Hartwood 88, Inc. et al. Defendants

DEFENDANT

PROOF OF SERVICE

TO: Pt. Envoy Bond & Insurance Co.

TO: B.C.S. Services INC.

TO: _____

I, the undersigned (plaintiff / defendant), certify that on the 3rd day of July, 2009, I served a copy of this Answered Complaint Case # 07 C 1367 to each person whom it is directed by way of email to the attorney representing the plaintiff.

Name Erg Stec

Address 56 E S. Kensington

City/Zip La Grange IL 60525

Telephone 708-288-2117

SIGNATURE / CERTIFICATION

DATE

8-20-09